

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) Case No.: 24-43233-357
URBAN CHESTNUT BREWING) Honorable Brian C. Walsh
COMPANY, INC.) Chapter 11 Proceeding
EIN - 27-1324055)
Debtor.) Hearing Date: September 12, 2024
) Hearing Time: 11:00 a.m.
) Location: Courtroom 5 North
)
) Spencer P. Desai, Esq.
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MOTION TO EXPEDITE HEARING ON (A) APPLICATION TO EMPLOY THE DESAI LAW FIRM, LLC; (B) MOTION FOR ENTRY OF ORDER AUTHORIZING DEBTOR'S USE OF CASH COLLATERAL PURSUANT TO 11 U.S.C. § 363; (C) MOTION FOR ORDER AUTHORIZING PAYMENT OF PRE-PETITION WAGES AND SALARIES IN THE ORDINARY COURSE OF BUSINESS; (D) MOTION FOR ORDER AUTHORIZING PAYMENT OF PRE-PETITION CLAIMS OF CRITICAL VENDORS (E) MOTION FOR ORDER AUTHORIZING CONTINUED USE OF CERTAIN EXISTING BANK ACCOUNTS

COMES NOW Debtor Urban Chestnut Brewing Company, Inc. ("Debtor") by and through its undersigned counsel, files its Motion to Expedite Hearing on *(i) Application to Employ The Desai Law Firm, LLC as Counsel for the Debtor; (ii) Motion for the Entry of Order Authorizing the Debtor to Use Cash Collateral Pursuant to 11 U.S.C. §363(a); (iii) Motion for Order Authorizing Payment of Pre-Petition Wages and Salaries in the Ordinary Course of Business; (iv) Motion for Order Authorizing Payment of Critical Vendors; (v) Motion for Order Authorizing Continued Use of Certain Existing Bank Accounts* (the "Motion to Expedite" and "Motions") pursuant to E.D. Mo. L.B.R. 9013-2. In support thereof, Debtor respectfully states as follows:

1. Debtor has filed the Motions and hereby seeks a hearing to consider the Motions at **11:00 a.m. on September 12, 2024**. Capitalized terms used in this Motion to Expedite but not defined herein shall have the meanings ascribed to them by the Motions.

2. Debtor seeks a hearing on the Motions on an expedited basis because the relief requested in the Motions is necessary for efficient administration of the Debtor's estate.

3. The Motions were served on all directly affected parties and the 20 largest unsecured Creditors. Notice of the Motions was served on all creditors in sufficient time for consideration of the relief requested.

4. The Motions seek interim relief so any party requiring additional notice or time to respond will not be prejudiced.

WHEREFORE, Debtor prays this Court make and enter its Order granting this Motion to Expedite Hearing and setting the *(i) Application to Employ The Desai Law Firm, LLC as Counsel for the Debtor; (ii) Motion for the Entry of Order Authorizing the Debtor to Use Cash Collateral Pursuant to 11 U.S.C. §363(a); (iii) Motion for Order Authorizing Payment of Pre-Petition Wages and Salaries in the Ordinary Course of Business; (iv) Motion for Order Authorizing Payment of Critical Vendors and (v) Motion for Order Authorizing Maintenance of Cash Management System and Continued Use of Certain Existing Bank Accounts* and any responses thereto for expedited hearing at **11:00 a.m. on September 12, 2024**, or as soon thereafter as counsel may be heard, and providing for such other and further relief as this Court deems just and proper.

Dated: September 10, 2024

Respectfully submitted,

THE DESAI LAW FIRM, LLC

By: /s/ Spencer P. Desai

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PROPOSED COUNSEL FOR DEBTOR